

been (at least partially) implemented by one or more ILEC. However, these reforms are not yet national consensus practices. All are intended to reduce the cost, complexity and excessive provisioning intervals which today limit the competitive value of collocation.

Amid the details of our analysis, however, is a broader message and more fundamental conclusion. The purpose of collocation -- indeed, the purpose behind each of the carrier-entitlements in the 1996 Act -- is to foster a competitive environment for the benefit of consumers. Regulators should be concerned with the speed, efficiency and utility of collocation because it will determine the choices and prices paid by consumers. The unnecessarily complex, expensive and slow collocation process that typifies today's environment results in higher prices, fewer choices and delayed innovation that directly impacts customers. The time is now to reform collocation and come one step closer to the competitive vision embraced by Congress when it passed the Telecommunications Act of 1996.

Uncaging Competition: Reforming Collocation for the 21st Century
Attachment A

Typical Procedures to Order and Provision Traditional Collocation

Step	Physical Collocation	Virtual Collocation
Application	CLEC issues an application and appropriate fees to ILEC specifying its collocation requirements (i.e., ILEC premises where collocation is required, floor space requirements, technical equipment requirements, etc.). This application triggers various organizations within the ILEC (e.g., facility planners, space planners, equipment engineers) to review the application and make an assessment of the ILEC's ability to meet the CLEC's collocation requirements.	
Application Response	ILEC response to CLEC includes results of investigation process triggered by application such as whether the space requested is available or, if not, how much space (if any) is available. Response also includes the configuration of the space, if special construction/conditioning is necessary to make space available and the cost for the collocation arrangement.	Once the ILEC has completed its design and planning activities, it informs the collocater of the floor space and power requirements for the equipment the CLEC wishes to install. The ILEC also provides the CLEC with a list of vendors certified to perform the equipment installation.
Firm Order	After a specific interval given to the CLEC to review the ILEC's response the CLEC must issue a firm order and associated fees to the ILEC to begin the construction process.	
Joint Planning Session	Upon receipt of the firm order and fees the ILEC will contact the CLEC to establish a collocation planning meeting. During this meeting the two parties will discuss and come to agreement on design of collocated space (if applicable), equipment configuration, power requirements, etc. Construction intervals are also established during these sessions.	

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Procedures to Order and Provision Traditional Collocation (Continued)

Step	Physical Collocation	Virtual Collocation
Space Preparation and Construction	During this phase, space preparation work such as removal of retired equipment, removal of hazardous materials, mainframe additions, etc., is performed if this work is necessary to make premises space available to CLEC(s). If there is readily available space for collocation then this phase involves the construction of the collocation cage for the CLEC's equipment.	Not Applicable
Equipment Installation	After the collocated area is prepared and jointly inspected by the ILEC and the CLEC (physical collocation only), the CLEC, using an approved vendor, can begin to have its equipment installed in the collocated space (or, in the case of virtual collocation, the ILEC's central office space). Also, in the case of virtual collocation, the ILEC will function as the installation project manager and will, in conjunction with the equipment installation contractor, determine the installation interval. Along with this work, the ILEC, or its vendor, needs to install the equipment (e.g., additional blocks on the main distribution frame) and the cabling to the common (POT or POI) frame in the collocation area. This installation is necessary to allow the CLEC to interconnect with the ILEC or obtain access to the unbundled elements.	

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Procedures to Order and Provision Traditional Collocation (Continued)

Step	Physical Collocation	Virtual Collocation
Training of ILEC Personnel	Not Applicable	The CLEC is responsible for training the ILEC's technicians who will be responsible for maintaining this equipment. This training is done at the CLEC's cost. The CLEC is also responsible for providing the ILEC all of the test equipment, tools and spare plug-ins the ILEC's technicians will need to maintain and repair the collocated equipment.
Testing and Acceptance	Upon completion of the equipment installation, the parties perform a series of tests to insure the equipment has been installed correctly, and is functioning properly, there is continuity between the ILEC's frame(s) to the common frame (physical collocation) or to the CLEC's equipment (virtual collocation), and there is continuity from the common frame to the collocated equipment (physical collocation). Successful completion of this testing allows the CLEC to begin to offer service using the equipment installed in this collocation arrangement.	